

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF WEST VIRGINIA
AT CHARLESTON**

IN RE: ETHICON, INC., PELVIC REPAIR SYSTEM PRODUCTS LIABILITY LITIGATION	Master File No. 2:12-MD-02327 MDL 2327
THIS DOCUMENT RELATES TO ALL CASES	JOSEPH R. GOODWIN U.S. DISTRICT JUDGE

CROSS NOTICE OF VIDEO DEPOSITION OF RON HORTON

TO: ALL COUNSEL OF RECORD

PLEASE TAKE NOTICE that the deposition of MICHAEL HULSE, M.D. will be taken jointly in connection with *In Re C.R. Bard, Inc. MDL No. 2187, Pelvic Repair System Products Liability Litigation*, and *Carol Cavness v. Teresa Kowalczyk, M.D., et al.* District Court of Dallas County, Texas, 95th District Court, Cause No. DC-14-04220, upon oral examination on July 1, 2015, 9:00 a.m. EST, at the offices of Riker Danzig Scherer Hyland & Perretti, LLP, One Speedwell Avenue, Headquarters Plaza, Morristown, New Jersey, 07962-1981

PLEASE TAKE FURTHER NOTICE that in accordance with Rule 30 of the Federal Rules of Civil Procedure, the procedures set forth *In Re: Ethicon Inc., Pelvic Repair System Products Liability Litigation*, MDL No. 2327, Defendants Ethicon Inc. and Johnson & Johnson hereby cross-notice this deposition for any and all purposes permitted by the Federal Rules of Civil Procedure, the rules of the MDL Court, and any other state or local rules that apply to this action. Defendants Ethicon, Inc. and Johnson & Johnson further state that this deposition shall be conducted in accordance with and subject to the Protective Orders entered in

In Re C.R. Bard, Inc. MDL No. 2187, Pelvic Repair System Products Liability Litigation and in
In Re: Ethicon Inc., Pelvic Repair System Products Liability Litigation, MDL No. 2327.

This deposition will be taken before a person authorized by law to administer
oaths and video-taped.

Dated: June 29, 2015.

Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that on June 25, 2015, I electronically filed the foregoing document with the Clerk of the Court using the CM/ECF system which will send notification of such filing to CM/ECF participants registered to receive service in this MDL.

/Christy D. Jones
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